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DMJ:CNC/JPD

F.#2010R01603/OCDEF # NY-NYE-0686

FEB 03 2011



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

2/14/11
LONG ISLAND OFFICE

- - - - -X

UNITED STATES OF AMERICA

S U P E R S E D I N G
I N D I C T M E N T

- against -

DOMINICK CURATOLA,
GERMAN CHAJCHIC,
MICHAEL DECRESENZO,
JOSE ALEJANDRO CASTILLO-MEDINA,
-STEVEN MARTIN,
-KERRY IASPARRA,

-BRIAN SULLIVAN,
-GREGORY BALLIN,
-ERIC PREIMER,
-MICHAEL BRADLEY and
-JOSEPH CAMPO,

Cr. No. 10 CR 991 (S-1) (JS)
(T. 21, U.S.C., §§
841(a) (1),
841(b) (1) (B) (vii),
841(b) (1) (D), 846,
853(a), 853(p), 952(a),
960(a) (1), 960(b) (3),
960(b) (4) and 963;
T. 18, U.S.C., §§ 2
and 3551 et seq.)

Defendants.

- - - - -X

THE GRAND JURY CHARGES:

COUNT ONE
(Conspiracy To Distribute Marijuana)

1. On or about and between March 1, 2010 and November 16, 2010, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants DOMINICK CURATOLA, GERMAN CHAJCHIC, MICHAEL DECRESENZO, JOSE ALEJANDRO CASTILLO-MEDINA, STEVEN MARTIN, KERRY IASPARRA, , BRIAN SULLIVAN, GREGORY BALLIN, ERIC PREIMER, MICHAEL BRADLEY and JOSEPH CAMPO, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved 100

kilograms or more of a substance containing marijuana, a Schedule I controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(B)(vii); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO✓

(Conspiracy to Import Marijuana)

2. In or about and between June 2010 and November 16, 2010, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants DOMINICK CURATOLA and GERMAN CHAJCHIC, together with others, did knowingly and intentionally conspire to import a controlled substance into the United States from a place outside thereof, which offense involved a substance containing marijuana, a Schedule I controlled substance, contrary to Title 21, United States Code, Section 952(a).

(Title 21, United States Code, Sections 963, 960(a)(1) and 960(b)(3); Title 18, United States Code, Sections 3551 et seq.)

COUNT THREE✓

(Distribution and Possession of Marijuana
with Intent to Distribute)

3. On or about May 13, 2010, within the Eastern District of New York, the defendants DOMINICK CURATOLA and . did knowingly and intentionally distribute and possess

with intent to distribute a controlled substance, which offense involved a substance containing marijuana, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT FOUR✓

(Distribution and Possession of Marijuana
with Intent to Distribute)

4. On or about May 15, 2010, within the Eastern District of New York and elsewhere, the defendants DOMINICK CURATOLA, MICHAEL DECRESENZO, STEVEN MARTIN and KERRY IASPARRA did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing marijuana, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT FIVE✓

(Distribution and Possession of Marijuana
with Intent to Distribute)

5. On or about May 23, 2010, within the Eastern District of New York, the defendants DOMINICK CURATOLA and JOSEPH CAMPO did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense

involved a substance containing marijuana, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT SIX ✓

(Distribution and Possession of Marijuana
with Intent to Distribute)

6. On or about May 27, 2010, within the Eastern District of New York and elsewhere, the defendants DOMINICK CURATOLA, MICHAEL DECRESENZO, STEVEN MARTIN and KERRY IASPARRA did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing marijuana, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT SEVEN ✓

(Distribution and Possession of Marijuana
with Intent to Distribute)

7. On or about June 22, 2010, within the Eastern District of New York, the defendants DOMINICK CURATOLA, MICHAEL DECRESENZO and BRIAN SULLIVAN did knowingly and intentionally distribute and possess with intent to distribute a controlled

substance, which offense involved a substance containing marijuana, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT EIGHT ✓

(Distribution and Possession of Marijuana
with Intent to Distribute)

8. On or about June 24, 2010, within the Eastern District of New York, the defendant ERIC PREIMER, together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing marijuana, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT NINE ✓

(Importation of Marijuana)

9. On or about August 10, 2010, within the Eastern District of New York and elsewhere, the defendant DOMINICK CURATOLA, together with others, did knowingly and intentionally import a controlled substance into the United States from a place

outside thereof, which offense involved a substance containing marijuana, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(4); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TEN ✓

(Distribution and Possession of Marijuana
with Intent to Distribute)

10. On or about August 10, 2010, within the Eastern District of New York, the defendants DOMINIC CURATOLA and MICHAEL BRADLEY did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing marijuana, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT ELEVEN ✓

(Distribution and Possession of Marijuana
with Intent to Distribute)

11. On or about August 11, 2010, within the Eastern District of New York and elsewhere, the defendants DOMINIC CURATOLA and STEVEN MARTIN, together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a

substance containing marijuana, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TWELVE ✓

(Importation of Marijuana)

12. On or about November 4, 2010, within the Eastern District of New York and elsewhere, the defendant DOMINICK CURATOLA, together with others, did knowingly and intentionally import a controlled substance into the United States from a place outside thereof, which offense involved a substance containing marijuana, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(4); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT THIRTEEN ✓

(Distribution and Possession of Marijuana
with Intent to Distribute)

13. On or about November 4, 2010, within the Eastern District of New York, the defendant DOMINICK CURATOLA, together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which

offense involved a substance containing marijuana, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT FOURTEEN ✓
(Possession of Marijuana
with Intent to Distribute)

14. On or about November 16, 2010, within the Eastern District of New York, the defendant GREGORY BALLIN did knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved a substance containing marijuana, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D); Title 18, United States Code, Sections 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

15. The United States hereby gives notice to the defendants that, upon conviction of any of the offenses charged in this Superseding Indictment, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offenses, and any property used, or intended to be used, in any

manner or part, to commit, or to facilitate the commission of such offenses.

16. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value;

or

(e) has been commingled with other property which cannot be divided without difficulty;


it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any

other property of such defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL


FOREPERSON


LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. 10-CR-991 (S-1) (JS)

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

DOMINICK CURATOLA, GERMAN CHAJCHIC, MICHAEL DECRESENZO,
JOSE ALEJANDRO CASTILLO-MEDINA, STEVEN MARTIN, KERRY IASPARRA,
JEROME SCENZA, BRIAN SULLIVAN, GREGORY BALLIN, ERIC PREIMER,
MICHAEL BRADLEY, AND JOSEPH CAMPO,

Defendants.

INDICTMENT

(T. 21, U.S.C., §§ 841 (a) (1), 841 (b) (1) (B) (vii), 841 (b) (1) (D), 846, 853 (a), 853 (p),
952 (a), 960 (a) (1), 960 (b) (3), 960 (b) (4) and 963; T. 18, U.S.C., §§ 2 and 3551 et seq.)

A true bill.



Foreman

Filed in open court this _____ *day,**of* _____ *A.D. 19* _____

Clerk

Bail, \$ _____

CARRIE N. CAPWELL, AUSA, (631) 715-7836